

VAP

FILED

JUN 06 2012 JN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

) 12 CR 172

MICHAEL T. MASON

UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

v.

) Violations: Title 18, United States

) Code, Sections 371, 2315, and

) 2342(a) and Title 21, United States

) Code, Section 841(a)(1)

VICTORIA JABER and
CHADIA ABUEID

JUDGE DOW

COUNT ONE

MAGISTRATE JUDGE FINNEGAN

The SPECIAL SEPTEMBER 2011 GRAND JURY charges:

1. At times material to this indictment:

a. As used in this indictment, "contraband cigarettes" means a quantity in excess of 10,000 cigarettes, which bear no evidence of the payment of applicable taxes of the State of Illinois and Cook County, Illinois, which require a stamp or other indication to be placed on packages and other containers of cigarettes to evidence payment of cigarette taxes.

b. Defendants VICTORIA JABER and CHADIA ABUEID were not persons authorized to possess contraband cigarettes within the meaning of Title 18, United States Code, Section 2341(2).

2. From on or about December 29, 2010 continuing until at least on or about March 13, 2012, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, along with others known and unknown to the Grand Jury, knowingly

conspired and agreed with each other to commit offenses against the United States, namely:

- a. knowingly receiving, possessing, purchasing, and distributing in excess of 10,000 contraband cigarettes, in violation of Title 18, United States Code, Section 2342(a); and
- b. knowingly possessing and selling counterfeited tax stamps, which were a part of and constituted interstate commerce, knowing that the stamps had been counterfeited, in violation of Title 18, United States Code, Section 2315.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that defendants VICTORIA JABER and CHADIA ABUEID knowingly purchased in excess of 2.8 million contraband cigarettes in exchange for in excess of approximately \$291,000 in United States Currency.
4. It was further part of the conspiracy that that defendants VICTORIA JABER and CHADIA ABUEID exchanged approximately 100,000 counterfeited tax stamps, valued at in excess of \$128,000, for contraband cigarettes.
5. It was further part of the conspiracy that defendants VICTORIA JABER and CHADIA ABUEID placed counterfeited tax stamps on the contraband cigarettes, and then resold the contraband cigarettes for a profit.

Overt Acts

6. To effect the unlawful object of the conspiracy, defendants VICTORIA JABER and CHADIA ABUEID committed and caused to be committed the following overt acts,

among others:

- a. On or about March 17, 2011, defendants VICTORIA JABER and CHADIA ABUEID purchased contraband cigarettes from a confidential source who was cooperating with law enforcement agents, in exchange for approximately \$9,330 in United States Currency and 29,779 counterfeited tax stamps;
- b. On or about April 19, 2011, defendants VICTORIA JABER and CHADIA ABUEID purchased contraband cigarettes from a confidential source in exchange for approximately \$7,800 in United States Currency and 40,543 counterfeited tax stamps;
- c. On or about May 3, 2011, defendant CHADIA ABUEID sold a confidential source approximately 35,000 counterfeited tax stamps in exchange for approximately \$10,500 in United States Currency;
- d. On or about June 17, 2011, defendants VICTORIA JABER and CHADIA ABUEID purchased contraband cigarettes from a confidential source in exchange for approximately \$40,320 in United States Currency; and
- e. On or about December 15, 2011, defendants VICTORIA JABER and CHADIA ABUEID purchased contraband cigarettes from a confidential source in exchange for approximately \$23,060 in United States Currency.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about March 17, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, did knowingly receive, possess, purchase, and distribute in excess of 10,000 contraband cigarettes;

In violation of Title 18, United States Code, Section 2342(a).

COUNT THREE

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about March 17, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, knowingly possessed and sold counterfeited tax stamps, which were a part of and constituted interstate commerce, knowing that the stamps had been counterfeited;

In violation of Title 18, United States Code, Section 2315.

COUNT FOUR

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 19, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, did knowingly receive, possess, purchase, and distribute in excess of 10,000 contraband cigarettes;

In violation of Title 18, United States Code, Section 2342(a).

COUNT FIVE

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about April 19, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, knowingly possessed and sold counterfeited tax stamps, which were a part of and constituted interstate commerce, knowing that the stamps had been counterfeited;

In violation of Title 18, United States Code, Section 2315.

COUNT SIX

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about May 3, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHADIA ABUEID,

defendant herein, knowingly possessed and sold counterfeited tax stamps, which were a part of and constituted interstate commerce, knowing that the stamps had been counterfeited;

In violation of Title 18, United States Code, Section 2315.

COUNT SEVEN

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about June 17, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, did knowingly receive, possess, purchase, and distribute in excess of 10,000 contraband cigarettes;

In violation of Title 18, United States Code, Section 2342(a).

COUNT EIGHT

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about August 31, 2011, at Hickory Hills, in the Northern District of Illinois,

Eastern Division,

VICTORIA JABER,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a quantity of a mixture and substance containing a detectable quantity of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about September 15, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER,

defendant herein, did knowingly receive, possess, purchase, and distribute in excess of 10,000 contraband cigarettes;

In violation of Title 18, United States Code, Section 2342(a).

COUNT TEN

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about September 15, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division,

VICTORIA JABER,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a quantity of a mixture and substance containing a detectable quantity of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about November 22, 2011, at Hickory Hills, in the Northern District of Illinois,

Eastern Division,

VICTORIA JABER,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a quantity of a mixture and substance containing a detectable quantity of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about December 15, 2011, at Hickory Hills, in the Northern District of Illinois, Eastern Division, and elsewhere,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, did knowingly receive, possess, purchase, and distribute in excess of 10,000 contraband cigarettes;

In violation of Title 18, United States Code, Section 2342(a).

COUNT THIRTEEN

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

On or about February 8, 2012, at Hickory Hills, in the Northern District of Illinois, Eastern Division,

VICTORIA JABER,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of a quantity of a mixture and substance containing a detectable quantity of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION

The SPECIAL SEPTEMBER 2011 GRAND JURY further charges:

1. The allegations of Counts 7, 9, and 12 are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
2. As a result of the violations of Title 18, United States Code, Sections 2315 and 2342(a) of the foregoing indictment,

VICTORIA JABER and
CHADIA ABUEID,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses.

3. The interest of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(A) and Title 28, United States Code, Section 2461(c) include, but is not limited to, United States Currency in the form of proceeds traceable to the sale of contraband cigarettes.
4. If any of the forfeitable property described above, as a result of any act or omission by the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c);

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY